



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029**

November 19, 2015

Ms. Peggy Williams
Maryland Department of the Environment
1800 Washington Boulevard
Baltimore, Maryland 21230

Re: Site Inspection Sampling and Analysis Plan
Anderson Co. Cleaners
SEMS I.D. No. MDN000306894
State I.D. No. MD-633; SSID: A3YR

Dear Ms. Williams:

The United States Environmental Protection Agency ("EPA") Region III Office has reviewed the Sampling and Analysis Plan for Site Inspection ("SI SAP") at Anderson Co. Cleaners, located in the City of Hagerstown, Washington County, Maryland. The SI SAP is dated November 2015 and is expected to be implemented for a sampling event in the fall of 2015. EPA has the following comments regarding the soil exposure pathway for your consideration:

- A. Section 6.3, Soil Samples – Surface soil samples may be collected greater than one foot below the ground surface but not greater than two feet, to be consistent with the Hazard Ranking System criteria for establishing an observed release in the Soil Exposure Pathway. Subsurface samples may be collected at any depth where evidence of a release is observed or at the stated 4-5 feet below ground surface if no release is evident.
- B. As it has been noted, the grassy area where soil samples are to be collected has most likely been overlain with fill and samples collected from this soil layer may not represent the native soils most likely to have been impacted by a release. Please note in the final report what the depth of the fill material is that overlies the native soil.
- C. Additionally, given the potential for the onsite soils to be non-native fill material EPA asks that surface soils are analyzed for a full screening that includes inorganic metals and poly-chlorinated biphenyls, in addition to the semi-volatile organic compounds. Including these analytes will help determine whether the fill itself could be contaminated by more than just volatiles from an off-site source or if the on-site soils had been regraded after the original building was razed, it provides a more complete picture of the potential contaminants that children of the day care may become exposed to.

Upon a revised plan that includes a proposal for full screening soil analysis, EPA will review and approve the SI SAP. If you have any questions or concerns regarding the comments in paragraphs A through C above, you may reach me at 215-814-3354 or by email at vitello.joseph@epa.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Joseph Vitello", is placed below the word "Sincerely,".

Joseph Vitello, Site Assessment Manager
Site Assessment/Non-NPL Federal Facilities Branch

